

June 14, 2023

VIA ECF AND ELECTRONIC MAIL

The Honorable Katherine Polk Failla
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: In re Tether and Bitfinex Crypto Asset Litigation, 19-CV-09236 (KPF)

Dear Judge Failla,

We write on behalf of the parties following the discovery conference on June 7, 2023. The parties submit this proposed case management plan, which reflects the Court's grant of a 90-day extension to the discovery deadlines listed in ECF No. 298, except for the deadline for the parties to exchange privilege logs. Attached as Exhibit A is the parties' proposed case management schedule. Exhibit B is a redline against ECF No. 298.

The parties are available to discuss at the Court's convenience.

Respectfully submitted,

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